

EXHIBIT F

**Deposition of Denise Panyik-Dale
Taken on March 25, 2003**

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1 A Yes.

2 Q If at any point in time you want to take a
3 break speak up and we'll accommodate you. All right?

4 A Yes.

5 Q Do you have questions before we get started?

6 A No.

7 Q Have you ever had a deposition taken before?

8 A No.

9 Q Maybe I asked you that. I don't remember,
10 it's been a long day. Sorry.

11 How are you currently employed?

12 A Senior public relations manager for
13 Technologies.

14 Q Senior what?

15 A Public relations manager for Lucent
16 Technologies.

17 Q Public relations manager for Lucent. How
18 long have you been employed in that capacity?

19 A I've been with Lucent for seven years.

20 Q All in the same job?

21 A A little over two years in the same job.

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1 Q How were you employed at Lucent before
2 becoming senior public relations manager?

3 A I was public relations manager.

4 Q What are your job duties generally as public
5 relation manager, and tell me the difference is
6 between that and a senior public relations manager?

7 A The difference is I was promoted when I was
8 moved out to Baltimore.

9 Q What are your job duties?

10 A My job duties are to support all of the wire
11 line sales team, the people that sell to our customers
12 with public relations support, all of sales teams in
13 North America and Canada and the United States.

14 Q And seven years ago would take us back to
15 1996; is that about right?

16 A Yes, April 15, 1996.

17 Q All right. During that time that you've
18 been employed with Lucent have you had any dealings
19 with the Verizon customer team?

20 A Yes.

21 Q Or before that the Bell Atlantic customer

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1 Q Were you present or aware of any
2 conversations with Don Ames during which Lisa Bryan's
3 job performance was discussed?

4 A I don't know who Don Ames is. I've never
5 heard that name before.

6 Q Do you do know who Ed Sanford is?

7 A Um-hmm.

8 Q Were you present at any discussions in which
9 Ed Sanford discussed the possibility of Jennifer
10 Mazzarello becoming an account executive?

11 A No.

12 Q Have you ever had any discussions with Lisa
13 Bryan about Jennifer Mazzarello's job being in
14 jeopardy?

15 A No.

16 Q Did you ever tell Lisa Bryan that Jennifer
17 Mazzarello would be well advised to be looking for
18 another job elsewhere or words to that effect?

19 A I don't recall those specific words.

20 Q Words to that effect, I'm not trying to be
21 specific in the language.

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1 A It was a very difficult time and I think
2 that everyone that was working for Lucent at that
3 point in time was exploring other opportunities.

4 Q So the answer to my question is yes?

5 A Not specifically what you said.

6 Q Tell me what you did say, please.

7 A I think that whenever I was talking with
8 other people about what would -- we were all talking
9 in the hallway talk, about do you think you're going
10 to get cut, do you think you're going to get cut, do
11 you think whatever is going to be cut, my standard
12 answer is I don't think anyone is safe.

13 Q Did you have a discussion with Lisa Bryan
14 specifically about Jennifer Mazzarello being not safe?

15 A I don't recall anything specific to that.

16 Q Had you been advised by anyone in 2001 at
17 Lucent that Jennifer Mazzarello was earmarked or was
18 going to be terminated or let go from the company for
19 any reason?

20 A Are you referring to FMP?

21 Q I'm not sure what you mean by FMP. What's

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1 FMP stand for?

2 A Forced management reduction.

3 Q Reduction?

4 A Or program.

5 Q That --

6 A The answer to the question is no.

7 Q Have you ever been to Lisa Bryan's home?

8 A Yes.

9 Q On how many occasions?

10 A Is that one of those I can give an

11 approximate?

12 Q Yeah.

13 A Maybe four or five.

14 Q During any of those meetings or probably not

15 the right word, during the get-togethers at Lisa

16 Bryan's home did you ever have a discussion about

17 Jennifer Mazzarello's job or employment at Lucent?

18 A Not that I recall.

19 Q Did you ever have discussions with Lisa

20 Bryan about Pam Worley?

21 A No.